

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	x
SII LIQUIDATION COMPANY, <i>et al.</i>	:
Debtors.	Chapter 11
	:
	Case No. 10-60702
	:
	Judge Russ Kendig
	:
	x
SCHWAB INDUSTRIES, INC.,	:
Plaintiff,	:
v.	:
HUNTINGTON NATIONAL BANK, <i>et al.</i>	Adv. Proc. Nos. 14-6024, 14-6025
Defendants.	:
	:
	x

**MOTION FOR SANCTIONS AGAINST  
PLAINTIFF SCHWAB INDUSTRIES, INC. AND ITS COUNSEL**

Under Fed. R. Bankr. P. 9011, 28 U.S.C. § 1927, and 11 U.S.C. § 105(a), defendants Hahn Loeser & Parks LLP, Lawrence E. Oscar, and Andrew Krause (the HLP defendants) respectfully request that the Court impose sanctions against plaintiff Schwab Industries, Inc. and its counsel, Charles V. Longo. The Court should order the plaintiff and its attorneys, jointly and severally, to reimburse the HLP defendants for the reasonable costs and attorneys' fees they have incurred in these adversary proceedings.

A memorandum in support is attached.

Respectfully submitted,

/s/ Daniel R. Warren \_\_\_\_\_

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Lawrence E. Oscar, and Hahn Loeser &  
Parks LLP*

## **CERTIFICATE OF SERVICE**

I certify that on November 24, 2014, a true and correct copy of defendants Hahn Loeser & Parks LLP, Lawrence E. Oscar, and Andrew Krause's Motion for Sanctions and Memorandum in Support were served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Daniel R. Warren on behalf of defendants Hahn Loeser & Parks LLP, Lawrence E. Oscar, and Andrew Krause at [dwarren@bakerlaw.com](mailto:dwarren@bakerlaw.com)

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Matthew D. Greenwell on behalf of plaintiff Schwab Industries, Inc. at [matt@cvlongolaw.com](mailto:matt@cvlongolaw.com)

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United States Trustee on behalf of United States Trustee at (Registered address)@usdoj.gov

And by regular U.S. mail, postage prepaid, on:

Andrew Nicoll on behalf of defendant Huntington National Bank (in Adv. No. 14-6025) at:  
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